

Exhibit 31

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May 22, 2020

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Re: Application of Benjamin Steinmetz for an order to take discovery from Vale S.A., Vale Americas Inc., Rio Tinto PLC, and Rio Tinto Limited pursuant to
28 U.S.C. § 1782

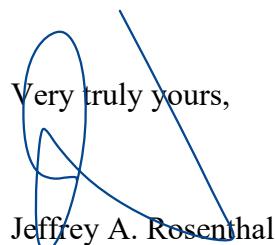
Ladies and Gentlemen:

Vale S.A. and Vale Americas Inc. (collectively “Vale”) are aware of your Application of Benjamin Steinmetz for an Order to Take Discovery from Vale S.A., Vale Americas Inc., Rio Tinto plc and Rio Tinto Limited Pursuant to 28 U.S.C. § 1782 (the “Application”). While the Application relies on the Declaration of Dr. Avi Yanus (the “Yanus Declaration”), it is indisputable that Dr. Yanus has no first-hand knowledge of virtually any of the matters discussed in his declaration, including particularly the conversations he purports to quote throughout the Yanus Declaration. He does not identify who recorded or informed him of the alleged conversations, but appears to base his sworn declaration exclusively on listening to secret recordings. Given that the Yanus Declaration is plainly incompetent evidence, Vale hereby demands full and complete copies of all recordings made by Black Cube or any other representative of Mr. Steinmetz of conversations with any present or former Vale employee, officer or director, including without limitation the recordings referenced in paragraph 21-23 and footnote 1 of the Yanus Declaration, no later than the close of business on Tuesday, May 26.

Michael S. Kim, Esq.
Josef M. Klazen, Esq.
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Carolina Leung, Esq., p. 2

Moreover, notwithstanding his declaration that “[t]he information contained in this statement is based upon my own knowledge and/or belief. When information is not based upon my own knowledge, I will explain the source of the information and/or belief,” Dr. Yanus never discloses either the source of or basis for his information and/or belief with respect to his assertion that the recordings were made in “one-party consent states.” The Yanus Declaration does not even reveal material facts in the analysis of the legality of those recordings, including without limitation where Black Cube’s deceived counterpart was at the time of each of the recorded telephonic or Skype sessions and how Mr. Yanus knows such location. Given the materiality of this information to question of the admissibility of these recordings, please provide us with complete details no later than the close of business on Tuesday, May 26.

Vale reserves all rights.

Very truly yours,

Jeffrey A. Rosenthal